

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

In re:)	Chapter 11
)	Case Nos. 01-1139 through 01-1200
W.R. GRACE & CO., et al.,)	
)	
Debtors,)	
_____)	
)	
OFFICIAL COMMITTEE OF)	
ASBESTOS PERSONAL INJURY)	
CLAIMANTS, et al.,)	
)	
Plaintiffs,)	
)	
-against-)	Adv. No. 02-2210
)	[LEAD DOCKET]
SEALED AIR CORPORATION)	
and CRYOVAC, INC.,)	
)	
Defendants.)	
_____)	
OFFICIAL COMMITTEE OF)	
ASBESTOS PERSONAL INJURY)	
CLAIMANTS, et al.,)	
)	Adv. No. 02-2211
Plaintiffs,)	
)	
-against-)	
)	
FRESENIUS MEDICAL CARE,)	
HOLDINGS, INC., et al.,)	<u>This Document Pertains to Adv. No. 02-2210</u>
)	
Defendants.)	
_____)	

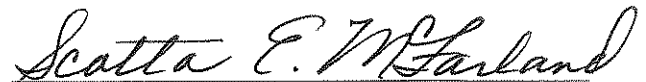
MOTION FOR LEAVE TO FILE A MOTION *IN LIMINE*

In light of the Court's denial of Grace's Motion to Withdraw its Intervention, Grace hereby seeks leave to file the attached Motion *in Limine*. The principles set forth in the Motion have been asserted by Grace in connection with prior proceedings, and therefore will come as no surprise to the litigants in this case. The purpose of the Motion *in Limine* is to present the same

principles now in support of a request that the Court rule *in limine* that estimation evidence cannot be presented **against Grace** for purposes of establishing Grace' estimated or actual liability to any current or future claimant against Grace in the Chapter 11 cases.

September 19, 2002

Respectfully submitted,

A handwritten signature in cursive script, reading "Scotta E. McFarland". The signature is written in dark ink and is positioned above the typed name and address.

Laura Davis Jones (Bar No. 2436)
Scotta E. McFarland (Bar No. 4184)
PACHULSKI, STANG, ZIEHL, YOUNG &
JONES P.C.
919 North Market Street, 16th Floor
Wilmington, Delaware 19801
(302) 652-4100

and

David M. Bernick
Michelle H. Browdy
Scott A. McMillin
KIRKLAND & ELLIS
200 East Randolph Drive
Chicago, Illinois 60601
(312) 861-2000

Co-Counsel for the Debtors and Debtors in
Possession